

# **EXHIBIT 22**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ANNE DE LACOUR, ANDREA WRIGHT,  
and LOREE MORAN individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

COLGATE-PALMOLIVE CO., and TOM'S  
OF MAINE INC.

Defendants.

Civil Action No. 1:16-cv-08364

**PLAINTIFF LOREE MORAN'S  
RESPONSES TO DEFENDANTS'  
AMENDED SECOND SET OF  
REQUESTS FOR ADMISSION**

PROPOUNDING PARTY: Colgate-Palmolive Co., Tom's of Maine Inc.

RESPONDING PARTIES: Plaintiff Loree Moran

SET NUMBER: Two

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure (the "Federal Rules") and the applicable local rules, Plaintiff Loree Moran, through her undersigned counsel, hereby responds and objects to Defendants Colgate-Palmolive Co. and Tom's of Maine Inc.'s Amended Requests for Admission, Set No. Two, dated February 9, 2022 (the "Requests"), as follows:

**PRELIMINARY STATEMENT**

Preliminarily, it should be noted that Plaintiff has not completed her investigation of the facts relating to this case, has not completed discovery in this action and has not completed preparation necessary for trial. All of the answers contained herein are based only on such information and documents that are presently available to and specifically known to Plaintiff. It is anticipated that further discovery, independent investigation, and legal research and analysis will supply additional facts, add meaning to the known facts, and establish entirely new factual and legal conclusions. All of these may lead to substantial additions to, modifications of, and variations from the information set forth herein. The following responses are given without prejudice to Plaintiff's right to produce evidence of subsequently discovered facts that Plaintiff may recall or

learn at a later date. Plaintiff accordingly reserves the right to change all answers herein as additional facts are ascertained, analysis is made, and legal research is completed.

### **GENERAL OBJECTIONS**

Plaintiff incorporates by reference the following general objections and responses to each of the requests for admission, whether or not stated as a specific objection to each request.

1. Plaintiff generally objects to the requests for admission on the grounds that the requests, individually and taken as a whole, are overly broad, unduly burdensome, oppressive, and seek to impose broader response obligations on Plaintiff than those imposed by the Federal Rules of Civil Procedure.

2. Plaintiff further objects to the requests for admission on the ground and to the extent they seek information that is not relevant to the subject matter of this action or not proportional to the needs of the case.

3. Plaintiff objects to the requests for admission on the ground and to the extent they call for legal conclusions.

4. Plaintiff objects to the requests for admission on the ground that they call for disclosure of communications that are protected by the attorney-client privilege, the attorney work product privilege, or any other applicable privilege.

5. Plaintiff generally objects to the requests to the extent they seek admissions regarding information outside the scope of Fed. R. Civ. P. Rule 36(a)(1).

**RESPONSE TO REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 40:**

Admit that Plaintiff did not exclude herself from the Class in *Gay v. Tom's of Maine*, Case No. 14-cv-60604-KMM (S.D. Fl. March 2014).

**RESPONSE:**

Plaintiff objects to the request to the extent it: i) calls for a legal conclusion; (ii) seeks information already in the possession of Defendant; and iii) calls for the disclosure of information not within Plaintiff's personal knowledge. Subject to and without waiver of the foregoing objections, Plaintiff responds: Admit.

Dated: March 11, 2022

Respectfully Submitted,

By: /s/ Sarah N. Westcot  
Sarah N. Westcot

Sarah N. Westcot (admitted *pro hac vice*)  
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*Attorneys for Plaintiffs and the Classes*

**CERTIFICATE OF SERVICE**

I, Georgina McCulloch, certify that on the 11th day of March, 2022, I caused a copy of the foregoing Plaintiff Anne de Lacour's Responses to Defendants' Second Set of Requests for Admission to be served by electronic mail upon all counsel of record.

By: /s/ Georgina McCulloch  
Georgina McCulloch